01293

JUN 2 9 1998

7505 N. First St., #102
Fresno, CA 93720
May 26, 1998

Lester Snow, Executive Director
CalFed Bay/Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Dear Mr. Snow:

As Conservation Chair for the Fresno Audubon Society, I have great interest in the CalFed planning process, and the preferred alternative that will be selected. Central and Northern California's environment, including the San Joaquin/Sacramento Bay/Delta have been significantly degraded due to past water diversions, and substantial wildlife habitat has been degraded or lost entirely. I would like to submit the following comments in regard to selecting a preferred alternative, and to CalFed's environmental documents.

A. Ecosystem Restoration

I am greatly concerned that agricultural interests will prevent CalFed from implementing the ecosystem program that will restore habitat for salmon, steelhead, numerous species of birds and other wildlife. The lower San Joaquin River is especially of great interest to the Fresno Audubon Society. I was told by a CalFed official at a public hearing in Fresno this spring that the lower San Joaquin River has a low priority to CalFed because of the great degree of ecological degradation that has occurred below Friant Dam. I greatly disagree with this position, and urge CalFed planners to make ecosystem restoration of the lower San Joaquin River a high priority. Year-round water flows are required in order to restore one of California's great rivers, to improve water quality in the river, and to provide increased fresh water flows into the Bay/Delta. I would like to quote from a Fresno Bee article by Mark Grossi that was published on May 1, 1998:

"The big news here is that the native fish in the San Joaquin River are really in trouble...They're not just dying - they're diseased and deformed from the farm drainage and pesticides going into the river". " State officials said the fish, pesticide and nitrate results seemed sound. They said the study will help them push for a long-term strategy to clean up the river... State officials said the most dramatic results seemed to be in the lower San Joaquin River, which has been damaged by pesticides, fertilizers, city runoff and bank erosion. The insecticide DDT is still in the river, even though it has been banned for years. The study found levels are still high in fish and clam tissues, compared to studies done in the 1970's and 1980's."

I am also concerned that CalFed has not resolved technical issues regarding the effects of water diversions on fisheries, and that insufficient data is available at this time to select a preferred

C-012037

alternative. It is very important that CalFed consider the Trinity River as an important part of the Bay/Delta system, and that CalFed includes all of the San Francisco Bay as an integral part of the Bay/Delta ecosystem.

B. Water Quality Program

I would like to again quote from the May 1 article published in the Fresno Bee:

"The San Joaquin Valley's well water - serving more than 2.5 million residents...is among the poorest quality in the United States. The U.S. Geological Survey, released this week, said the Valley's water was worse than half of the water scientists tested nationwide..." "The study found a contaminant called nitrate, probably from farm fertilizers, that violated drinking water standards in 25 percent of residential wells that were tested in 70 different sites in Central California. It also detected pesticides in more than half of the samples...As bad as the news was for Valley well water, it was worse for San Joaquin River fish, which were found dying with tumors and deformities....For nitrates, which scientists associated with farm fertilizer residues, the study showed the Valley's well water worse than 75 percent of the basins already studied nationwide...A lot of nitrates in drinking water can cause a fatal lack of blood oxygen in infants, called methemoglobinemia, or blue baby syndrome...The farm fertilizer residue or nitrate shows up in the (San Joaquin) river too. A lot of it travels to the river through mud and salt sloughs, the study said."

CalFed should insist on full implementation of existing water quality laws, including the authority to regulate and prosecute those contributing to nonpoint source pollution, including pesticides, nitrates, and urban runoff. CalFed should establish "total maximum daily loads" for such contaminants as mercury, selenium, animal waste, sediments, and pesticides. CalFed should evaluate water quality in the Bay/Delta system and watershed, and evaluate drinking water treatment technology in order to ensure safe drinking water for all consumers from the Bay/Delta region to Southern California. Health problems associated with pesticides include cancer, reproductive problems, abnormal cellular differentiation in fetuses and young mammals and human infants and children due to endocrine disruptors contained in pesticides, and acute pesticide poisonings in humans, which are not rare in Fresno County. Pesticides also decrease populations of beneficial insects and sources of food for many reptile and avian species.

CalFed should devote substantial resources to its water quality program in order that quality water is available for fish, wildlife, and humans.

C. Water use efficiency

I believe that CalFed has greatly underestimated the potential for water conservation by the

C-012038

agricultural sector and urban users, and that further analysis of this potential by CalFed is needed before a preferred alternative is selected. The ecological health and native fisheries of almost all of California's rivers have been damaged or destroyed by the construction of dams and reservoirs. CalFed should develop maximized goals for urban and agricultural water conservation, and should offer financial assistance to water users in order to realize the full potential for water conservation. CalFed should also provide funds for increased research on urban and agricultural water use efficiency.

I urge CalFed to fund a voluntary program that would pay willing sellers to stop irrigating farmland that is high in selenium and other toxic substances. CalFed did not include an analysis of such a program in its DEIR/S, and such an analysis should be included in its next draft. Farm runoff high in selenium is still contributing to the death of large numbers of birds on the west side of the San Joaquin Valley, and programs to retire west-side farmland should be a priority for CalFed.

D. Conveyance

I have great reservations about Alternative 3, which includes the construction of a peripheral canal that would divert a large quantity of water from the Sacramento-Bay/Delta ecosystem. Such a diversion would surely contribute to further ecological degradation of the Bay/Delta, and should not be considered as a CalFed alternative. The effects on native fisheries should be a priority in considering the construction of new canals, and detrimental effects should be identified and considered as sufficient reason to prevent the construction of canals that would adversely affect native fisheries.

E. Storage

Dams and reservoirs have caused significant ecological damage to California's rivers. Increasing available water through conservation and improved efficiency of use should be strongly pursued by CalFed over the construction of new dams and reservoirs. CalFed must evaluate and compare the economic and environmental costs of new surface storage with those offered by conservation and increased water use efficiency. I strongly believe that diverting more water out of the Bay/Delta ecosystem will cause environmental damage, and that the effects on the environment by new dams and reservoirs have not been sufficiently examined by CalFed planners.

F. Flood control

The restoration of wetlands as opposed to levee reconstruction should be viewed as a perferred CalFed alternative wherever possible. Wetlands provide habitat for wildlife, contribute to ground water recharge, as well as provide natural protection from floods. CalFed has not adequately

C-012039

evaluated the potential for wetland restoration.

G. Water transfers

I believe that CalFed has not fully considered potential adverse effects of water transfers. My concerns about water transfers include the potential to further deplete groundwater levels, they may be detrimental to rural communities, and they may increase the demand for fresh water from the Bay/Delta and its watershed. The environment of Northern and Central California, including the Bay/Delta and its watershed must not be adversely affected by any water transfers.

H. Farmland conservation and urbanization of the San Joaquin Valley

The loss of productive, high quality farmland on the east side of the San Joaquin Valley to urban sprawl and commercial development is a serious threat to our nation's food supply and to the quality of life in the Valley due to unsustainable human population growth, which would lead to increased air pollution and demand on the Valley's available water supply. CalFed planners should study the potential for keeping east-side farmland in production through programs that would provide reliable water supplies to participating farmers. Further urbanization of the Valley should be limited by CalFed by implementing programs that would restrict increased water availability for urban users in the Valley.

I greatly appreciate this opportunity to comment on the CalFed planning process, and I sincerely hope that CalFed planners will make ecosystem restoration, conservation, and water quality its highest priorities.

Sincerely,

Michael McFarland

Michael D. McFarland, Ph.D.
Conservation Chair
Fresno Audubon Society

cc: Vice President Al Gore

C-012040

Michael McFarland
7505 N. First St., Apt. 102
Fresno, CA 93720

FRESNO CA 937
PM
1998

19:03 06/27/98 P&DC FRESNO CA 937 ISS#7

98 JUN 29 AM 10:55

DEPARTMENT OF
WATER RESOURCES
SACRAMENTO

Lester Snow, Executive Director
CalFed Bay/Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

JUN 2 9 1998

95814X5509

C—012041